



# State of Louisiana

## Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO  
GOVERNOR

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SECRETARY

April 8, 2005

Darcie Olexia  
Office of Public Health  
Section of Environmental Epidemiology & Toxicology  
325 Loyola Avenue, Suite 210  
New Orleans, LA 70112

Re Human Health Assessment  
Devil's Swamp Lake  
Agency Interest Number (AI) 86800  
Alsen, East Baton Rouge Parish

RECEIVED  
05 MAR 20 PM 1:06  
LA/NM BRANCH

Dear Ms. Olexia

The Louisiana Department of Environmental Quality – Remediation Services Division has reviewed the “Public Health Assessment, Devil's Swamp Lake”. The following comments should be addressed before the document is released to the public:

#	Pg	¶	Comment
1	1	2	The Devil's Swamp Lake site is not the entirety of the swamp or wetland as this paragraph implies. The site is a small area in Devil's Swamp. The site comprises the lake and adjacent areas that have been contaminated by releases primarily from the former Rollins Environmental Services facility.
2	1	3	It would be more correct to say something like, “Prior to the 1950's, uses of the area around Devil's Swamp and Devil's Swamp Lake consisted of farming, grazing, and some logging.”
3	1	3	The list of contributing facilities is too inclusive. The only facility that we are aware of that contributed directly to contamination of the lake is the former Rollins facility.
4	1-2	5	The study mentioned was an investigation of the entire swamp area. It included samples from the area of Devil's Swamp Lake. Data from samples taken exclusively from the area of the lake have been compiled in a document entitled “Expanded Site Inspection for Devil's Swamp Lake” East Baton Rouge Parish, Louisiana dated October 21, 1993.



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5	2	1	The compounds mentioned may occur in Devil's Swamp Lake Only DDE, DDD, benzo(a)anthracene, benzo(a)pyrene, PCB congeners, aroclor-1254 and aroclor-1260, 1,2,4,5-tetrachlorobenzene, aldrin, dieldrin, hexachlorobenzene, DDT, and hexachlorobutadiene, exist in concentrations that threaten human and ecological health The contaminant concentrations near Petro Processors, Inc (PPI) and areas impacted by wastes from PPI should not be mentioned
6	2	1	"Enforcement activities" include identifying Potentially Responsible Parties (PRP) and getting them to remediate or contribute to the remediation of a site These activities continue throughout and after the remedial activity EPA is currently attempting to address the site by a process called "Enforcement First" This entails having the PRP investigate and remediate the site without it being listed on the National Priorities List (NPL or Superfund) This process is being successfully pursued on other sites
7	2	1	EPA will not conduct additional investigation of the site unless it is listed on the NPL The Devil's Swamp Lake site has only been proposed to the NPL It may not be included there
8	3	2	This is incorrect Devil's Swamp Lake is a small body of water that resulted from removal of material for construction of a levee at the northern end of the Baton Rouge Barge Harbor It is located within Devil's Swamp
9	4	4	The judge's order did not artificially separate PPI from Devil's Swamp or Devil's Swamp Lake The order stated that areas impacted by waste from the PPI site would be remediated under the Consent Decree regardless where they are located It also forbade the creation of a second Superfund site due to releases from PPI Coincidentally, the two areas are geographically distinct There is at least a half mile of relatively unimpacted swamp between the furthest down-gradient detection of PPI contaminants and the appearance of contaminants that likely originated from the former Rollins Facility
10	4	4	The extent of the release from PPI has been adequately defined in this direction This is especially true of water and sediment
11	7	4	LDEQ is not currently planning to participate in a boat visit
12	8	2	The nearest community is Alsen It is about $\frac{3}{4}$ mile away Scotlandville is 5 or 6 miles further away
13	9	2	The Human Health Risk Assessment and Ecological Risk Assessment separate the entire swamp into four sub areas, North Swamp, Channels, Devil's Swamp Lake, and South Swamp Devil's Swamp Lake and South Swamp are the only areas that will be considered in this NPL site
14	9	2	See comments 4 and 5 above

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15	9	3	Data from the North Bayou, Distributary Channels, and most of the North Swamp is not germane to the discussion of human health risk in Devil's Swamp Lake. The concentrations found near PPI should not be considered. Much of the area exhibiting elevated concentrations has been covered subsequent to the collection of these samples.
16	10	6	The discussion of North Bayou Baton Rouge is not germane to the Devil's Swamp Lake. The areas are a great distance apart.
17	11	2	Discussion of the Distributary Channels is not germane to the Lake. The areas are a great distance apart. These areas are also the least accessible in the Swamp.
18	11	6	Only the most southern part of the area designated "North Swamp" is part of the study area of this site.
19	28-36	Tables 1-9	The source document for these data is actually titled " <i>Human Health Risk Assessment, Devil's Swamp, Baton Rouge Louisiana</i> ". There is a document titled " <i>Expanded Site Inspection for Devil's Swamp Lake</i> ". It is dated October 21, 1993.
20	28	Table 1	This table should not be included. It discusses data from outside the study area.
21	29	Table 2	Only data from Devil's Swamp Lake should be included. See comments 19 + 20.
22	35	Tables 8-9	The only pathways that should be covered in this table are those in Devil's Lake and South Swamp. All of these exposures are via "trails on <u>private land</u> " or in the swamp. Access to all of these areas is also through private land.

Please contact this office at (225) 219-3222 with any questions. All written correspondence must include the AI number, **86800** and be submitted in triplicate to Keith L. Casanova, Administrator, Remediation Services Division, P O Box 4314, Baton Rouge, LA 70821-4314.

Do not hesitate to call Thomas Stafford of my staff at 225-219-3222.

Sincerely,



Keith L. Casanova  
Administrator

/tls

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